

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States Courthouse
Southern District of Texas
FILED

APR 19 2018

David J. Bradley, Clerk of Court

United States of America)
v.)
Charles Lee Williams) Case No. H18-0650M
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)

Defendant(s)

CRIMINAL COMPLAINT

Sealed
Public and unofficial staff access
to this instrument are
prohibited by court order.

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2016 to 2017 in the county of the United States in the
Southern District of Texas and elsewhere, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 1349, and	Conspiracy to Commit Wire Fraud, 18 U.S.C. §§ 1349, and
Title 18, United States Code, Section 1956(h).	Conspiracy to Commit Money Laundering, 18 U.S.C. § 1956(h).

This criminal complaint is based on these facts:

Defendant participated in a conspiracy to steal approximately \$3,439,900.81 from the Beck Group by means of wire fraud. Defendant also participated in a conspiracy to launder the proceeds of the wire fraud conspiracy to disguise the nature, location and ownership of the proceeds of the fraud scheme. See also Affidavit in Support of Criminal Complaint and Arrest Warrant.

Continued on the attached sheet.



Complainant's signature

BRANNON COKER SPECIAL AGENT
Printed name and title

Sworn to before me and signed in my presence.

Date: 4-20-18

City and state: Houston, TX



Judge's signature

NANCY JOHNSON
Printed name and title
United States Magistrate Judge

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
AND ARREST WARRANT**

Your Affiant, Brannon Coker, being duly sworn, deposes and says:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since January 2002. I am currently assigned to the FBI Houston Complex Financial Crimes squad, which is tasked with the investigation of complex financial crimes, including but not limited to, corporate fraud, stock market manipulation schemes, bank fraud, wire fraud and money laundering. I have gained experience in conducting such investigations through training in seminars, classes and everyday work related investigations. I have personally participated in investigations involving violations of federal law regarding money laundering and criminal enterprises that result from such unlawful activity. As a federal agent, I am authorized to investigate violations of the laws of the United States and to seek forfeiture of property under the authority of the United States.

2. I make this affidavit in support of a criminal complaint charging Charles Lee Williams with violations of 18 U.S.C. §§ 1349 (Conspiracy to Commit Wire Fraud) and 1956(h), (Conspiracy to Commit Money Laundering).

3. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. This affidavit is based on my own personal

knowledge, information provided by records, and interviews of witnesses and other law enforcement agents. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

BACKGROUND AND EVIDENCE OF FRAUD

4. The Beck Group was an international company doing business in Houston, Texas that worked with developers, institutions, organizations, and corporations to design and build their facilities. In the fall of 2017, the Beck Group reported to the FBI a fraudulent invoicing scheme of approximately \$3.5 million from the Le Meridien project in Houston, TX during 2016 and 2017. Williams and Beck Group employee Moses Seedorf Said orchestrated the scheme through the use of shell companies which had been set up as vendors in the Beck Group payment system. Said submitted and approved invoices for work that had not been conducted causing the Beck Group to send ACH payments to the various shell company bank accounts.

5. In 2016, Said was hired by the Beck Group as a construction manager to oversee the construction of the Le Meridien Hotel located in downtown Houston. As the construction manager for the Le Meridien Hotel, Said was authorized by the Beck Group to review and approve invoices submitted to the Beck Group for payment by vendors who provided goods or services related to the construction of the Le Meridien Hotel.

6. The Beck Group paid the invoices using the Automated Clearing House (ACH) payment system provided by its bank, Wells Fargo located in Dallas, Texas. The Beck Group's requests for ACH payments were electronically communicated to Wells Fargo's ACH processing center in Minnesota. To complete the processing of requests for ACH payments, the Wells Fargo ACH processing center in Minnesota communicated electronically with the Wells Fargo Bank branch in Dallas, Texas where the Beck Group maintained an account for paying vendors. The Wells Fargo Bank processing center in Minnesota then caused the funds to be transferred from the Beck Group's Wells Fargo bank account in Dallas, Texas to the bank accounts of the vendors.

7. On 11/8/2017, Said was interviewed pursuant to a proffer agreement at the U.S. Attorney's Office. Said stated that he contacted Charles Williams to arrange for shell companies to be established in order to submit false invoices to the Beck Group. Said and Williams agreed to a financial split of 40% for each of them and 20% to the owner of the shell company. Said further stated that Williams arranged for Lanamasha Hampton to contact him in order to work out the details for the shell companies to be established.

8. Shell companies were established by Hampton (Lucent Wholesale Lighting and Fixtures), Heather Ashley Sowa (Brace Scaffolding), Janell Crosby Quant (CIP Scaffolding), William Lewis Sutton, Jr. (IMAC Material Supply),

Collette Devoe Hines (AEB Building Materials), Hanna Musleh and Akram Elias Musleh (Scaffold Solutions).

9. An employee with the Beck Group confirmed that no work at the Le Meridien was performed by Lucent Wholesale Lighting, CIP Scaffolding, IMAC Material Supply, AEB Building Material or Scaffold Solutions.

10. The Edward Remy Group LLC was owned and controlled by Charles Williams with an associated Wells Fargo business account ending in 8044.

11. On or about 12/30/2016, Said caused to be transferred \$349,924.00 by ACH payment, from the Beck Group's Wells Fargo Bank account ending in 8789 to the Lucent account ending in 8810 at SunTrust Bank.

12. On 1/10/2017, Hampton wired \$192,500 from the Lucent account ending 8810 to the Edward Remy Group LLC account ending 8044 at Wells Fargo Bank. Williams was the sole signatory on the Edward Remy account. On 1/10/2017, Williams withdrew \$70,000 in cash from the *8044 account.

13. On 12/29/2016, Heather Ashley Sowa opened account ending 2416 in the name of Brace Scaffolding LLC at Bank of America. On or about 1/6/2017, Said caused to be transferred \$219,459.32 by ACH payment, from the Beck Group's Wells Fargo bank account ending in 8789, to Brace Scaffolding's Bank of America account ending in 2416.

14. On 1/10/2017, Brace Scaffolding wired \$140,320 to the Edward Remy Group LLC account ending in 8044 at Wells Fargo. On 1/17/2017, Williams withdrew \$5,000 in cash and \$10,000, in cash in two separate transactions.

15. On 12/9/2016, Said caused to be transferred \$129,703.68, by ACH payment, from the Beck Group's Wells Fargo account ending in 8789 to the AEB Building Materials account ending in 0191 at Wells Fargo Bank. On 12/21/2016, Hines wired \$53,000 from the AEB Building Material account ending 0191 to the Edward Remy Group account ending in 8044.

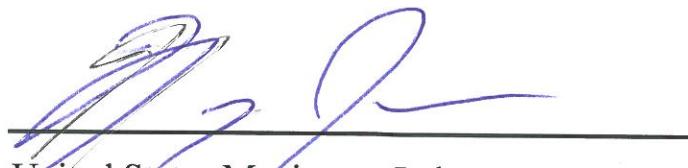
16. On or about 1/30/2017, Said caused to be transferred \$128,622.00 by ACH payment, from the Beck Group's account ending in 8789, to CIP Scaffolding Solutions' account ending in 6817 at Fifth Third Bank. Janell Quant opened account ending in 6817 on 12/2/2016 and was the sole signatory. On or about 2/6/2017, Quant withdrew funds from the CIP Scaffolding account ending in 6817 to purchase a cashier's check payable to Charles Williams in the amount of \$53,700. On or about 2/6/2017, Williams deposited the cashier's check into the Edward Remy LLC account ending 8044. On 2/17/2017, Quant withdrew funds from the CIP Scaffolding account ending in 6817 to purchase a cashier's check payable to Lanamasha Hampton in the amount of \$35,600.

Respectfully submitted,



Brannon Coker
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 20th day of April 2018, and I find
probable cause.



United States Magistrate Judge
Southern District of Texas